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January 19, 2022

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: Sjunde AP-Fonden, et al. v. Gen. Elec. Co., et al., Case No. 17-cv-8457 (JMF)

Dear Judge Furman:

Pursuant to Rules 7(B) and 7(C) of Your Honor's Individual Rules and Practices in Civil Cases ("Individual Practices"), Standing Order 19-MC-583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, Lead Plaintiff Sjunde AP-Fonden and additional plaintiff The Cleveland Bakers & Teamsters Pension Fund ("Plaintiffs") respectfully seek leave to file with redactions their contemporaneously filed Memorandum of Law In Support of their Motion For Leave To File A Sixth Amended Consolidated Class Action Complaint ("Motion to Amend"), a proposed amended pleading ("6AC"), and a redlined version of the proposed 6AC ("Redlined 6AC"), attached as Exs. 1 and 2 thereto, each of which contains references to and descriptions of materials designated by Defendants as "Confidential" pursuant to the Stipulated Protective Order (ECF No. 227).

On January 17, Plaintiffs asked Defendants to inform them whether Defendants would withdraw their confidentiality designations on the materials referenced in the Motion to Amend, 6AC, and Redlined 6AC. As of the time of this filing, Defendants have not agreed to withdraw any of their designations. Accordingly, pursuant to the Stipulated Protective Order, references to such material in Plaintiffs' submissions must be redacted where appropriate. Pursuant to Rule 7(C)(iii) of Your Honor's Individual Practices, Plaintiffs have contemporaneously filed the Motion to Amend, 6AC, and Redlined 6AC with redactions on ECF.

For these reasons, Plaintiffs respectfully request the Court grant their request for leave to file the Motion to Amend, 6AC, and Redlined 6AC with redactions, pending the Court's evaluation of a letter submission by Defendants explaining and justifying the need to redact references to these documents in Plaintiffs' filings pursuant to Rule 7(C)(i) of Your Honor's Individual Practices.

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Respectfully submitted,

KESSLER TOPAZ
MELTZER & CHECK, LLP

A handwritten signature in blue ink, reading "Sharan Nirmul". The signature is written in a cursive, flowing style.

Sharan Nirmul

cc: All counsel of record (VIA ECF)